

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

FIELDWOOD ENERGY LLC, *et al*  
Debtors.<sup>1</sup>

Chapter 11  
Case No. 20-33948 (MI)  
(Jointly Administered)

**NOTICE OF WITHDRAWAL OF OBJECTION OF FUGRO  
USA MARINE, INC. TO NOTICE TO CONTRACT PARTIES TO  
EXECUTORY CONTRACTS AND UNEXPIRED LEASES OF THE  
SCHEDULE OF ASSUMED CONTRACTS AND CURE AMOUNTS  
[Doc. No. 1490]**

**PLEASE TAKE NOTICE** that, on June 6, 2021, creditor, Fugro USA Marine, Inc., its subsidiaries and related entities (“Fugro”) filed its *Objection to Debtors’ Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedules of Assumed Contracts and Cure Amounts* (the “Objection”) [Doc. No. 1490].

**PLEASE TAKE FURTHER NOTICE** that the Debtors, through counsel, have advised counsel for Fugro that the Debtors will reject the Master Services Contract (the “MSC”) between Fugro USA Marine, Inc. (“Fugro”), as Supplier, and Fieldwood Energy LLC (“Fieldwood”) as Buyer, as of and subject to the occurrence of the Effective Date of the Plan, and as set forth more fully in Section 8.1 thereof. Furthermore, provided that Fugro withdraws its Objection, the

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Debtors will file an amended Schedule of Assumed Contracts at a reasonable time before the Effective Date that omits the “700620\_Joinder dated effective 11/14/2018” referenced in ¶ 9 of the Objection.” The Debtors further represented, through counsel, that Debtors do not intend to assume any contracts with Fugro.

**PLEASE TAKE FURTHER NOTICE** that, in light of the aforementioned representations made by the Debtors, through counsel, the undersigned hereby withdraws its Objection, Docket No. 1490.

Dated: July 26, 2021  
Houston, Texas

Respectfully submitted,

**BAKER, DONELSON, BEARMAN, CALDWELL &  
BERKOWITZ, PC**

By: /s/ Lacey E. Rochester  
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*Counsel for Fugro USA Marine, Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2021, a true and correct copy of the foregoing Notice has been served on all counsel and parties in interest who have consented to service via this Court’s ECF filing system at the time of filing.

/s/ Lacey E. Rochester